

**FERC Screens for 12 CP Allocations  
on DEC Adjusted Firm System Production Demands\***

Test # in FERC Order		2019	2020	2021	2022	Times 12CP is a better fit in the last 4 years
<b><u>1) On and Off Peak Test: tested against the following Peak methods</u></b>						
<b><u>1-CP Summer:</u></b>						
	Month of Peak	7	7	7	6	
	Peak/Annual Max	100.0%	100.0%	100.0%	99.7%	
	Off-Peak/Annual Max	90.2%	81.6%	85.4%	85.7%	
	Difference (12 CP at maximum 19%)	9.8%	18.4%	14.6%	14.0%	14.2%
	Is 12 CP a better fit than 1-CP Summer?	Yes	Yes	Yes	Yes	4
<b><u>1-CP Winter:</u></b>						
	Month of Peak	1	1	2	12	
	Peak/Annual Max	95.8%	92.2%	89.0%	100.0%	
	Off-Peak/Annual Max	90.6%	82.3%	86.4%	85.6%	
	Difference (12 CP at maximum 19%)	5.2%	9.9%	2.6%	14.4%	8.0%
	Is 12 CP a better fit than 1-CP Winter?	Yes	Yes	Yes	Yes	4
<b><u>2-CP (S/W) Peaks:</u></b>						
	Peak Min Month	1	1	2	6	
	Peaks/Annual Max	97.9%	96.1%	94.5%	99.8%	
	Off-Peak/Annual Max	89.6%	80.5%	85.1%	84.2%	
	Difference (12 CP at maximum 19%)	8.2%	15.6%	9.5%	15.6%	12.2%
	Is 12 CP a better fit than 2-CP (S/W)?	Yes	Yes	Yes	Yes	4
<b><u>4CP (2W, 2S) Peaks:</u></b>						
	Peaks/Annual Max	95.6%	93.7%	94.2%	96.9%	
	Off-Peak/Annual Max	88.7%	77.8%	82.8%	81.8%	
	Difference (12 CP at maximum 19%)	6.8%	15.8%	11.4%	15.1%	12.3%
	Is 12 CP a better fit than 4CP (2W, 2S)?	Yes	Yes	Yes	Yes	4
<b><u>4CP Max Peaks:</u></b>						
	Peaks/Annual Max	98.1%	96.5%	95.7%	98.4%	
	Off-Peak/Annual Max	87.5%	76.4%	82.1%	81.1%	
	Difference (12 CP at maximum 19%)	10.6%	20.1%	13.7%	17.3%	15.4%
	Is 12 CP a better fit than 4CP Max ?	Yes	No	Yes	Yes	3
<b><u>2) Ratio - Low to Annual Max:</u></b>						
	Difference (12 CP minimum 66%)	72.6%	66.0%	70.5%	68.5%	
	12 CP a good fit?	Yes	Yes	Yes	Yes	4
	Month of Annual Max:	Jul	Jul	Jul	Dec	
<b><u>3) Ratio - Average to Annual Max:</u></b>						
	Difference (12 CP minimum 81%)	91.0%	83.1%	86.6%	86.8%	
	12 CP a good fit?	Yes	Yes	Yes	Yes	4

\* Adjusted Firm Demands exclude the following from the DEC System Peaks published in FERC Form 1, page 401b:

- 1) Wholesale's Central Permitted Additional Resource (PAR) is excluded and Behind the Meter generation is included in DEC's native load cost of service.
- 2) Curtailable demands that were not curtailed at the times of the monthly system peaks.